

P O R T E R | S C O T T

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Attorneys for Defendants CITY OF ROSEVILLE, OFFICER DEAN RIANO, OFFICER SETH ADDINGTON, and
SERGEANT CHRISTOPHER CIAMPA

Exempt from filing fee pursuant to Government Code section 6103

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KATHERINE ROBLES, an individual; and H.R.,
by and through his guardian ad litem Katherine
Robles;

Plaintiffs,

vs.

CITY OF ROSEVILLE, a Municipal
Corporation; OFFICER DEAN RIANO, in his
official and personal capacity; OFFICER SETH
ADDINGTON, in his official and personal
capacity; SERGEANT CHRISTOPHER
CLAMPA, in his official and personal capacity;
and DOES 1-20, inclusive, individually, jointly
and severally,

Defendants. /

Case No.: 2:22-cv-00085-KJM-DB

**STIPULATION TO CONTINUE DEADLINES
FOR EXPERT DISCLOSURES, EXPERT
DISCOVERY, AND SUBSEQUENT DATES;
AND PROPOSED ORDER**

Complaint filed: 01/14/2022

The Parties, by and through their respective counsel of record, hereby stipulate as follows:

1. For months, the Parties have been engaged in extensive meet and confer efforts in good faith regarding the scope of FRCP Rule 35 Examinations of Plaintiff Katherine Robles.

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2. After months of meet and confer efforts, the Parties have reached an agreement regarding the scope, date, and location for two FRCP Rule 35 Examinations (a physical examination and a mental examination) of Plaintiff Katherine Robles. Further, the Parties reached an agreement for Defendants to obtain records for Plaintiff H.R. in lieu of a FRCP Rule 35 Examination. The Parties will be preparing a separate stipulation outlining those agreements.
3. In light of the foregoing, the Parties agree there is good cause to further modify the scheduling order as follows:
- a. FRCP Rule 35 Physical Examination of Plaintiff Katherine Robles: October 24, 2024
 - b. FRCP Rule 35 Mental Examination of Plaintiff Katherine Robles: October 25, 2024
 - c. Deadline for FRCP Rule 35 Examiners to disclose their FRCP Rule 26 and Rule 35 Reports: November 14, 2024
 - d. Deadline for Expert Disclosures (other than set forth above): December 16, 2024
 - e. Supplemental/Rebuttal Expert Disclosures: January 15, 2025
 - f. Expert Discovery deadline: March 14, 2025
 - g. All dispositive motions must be filed by: May 16, 2025

IT IS SO STIPULATED.

Dated: July 23, 2024

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: /s/ William E. Camy
William E. Camy
Megan N. Boelter
Attorney for Defendants

Dated: July 23, 2024

THE LAW OFFICES OF DALE K. GALIPO

By: /s/ Benjamin S. Levine
Benjamin S. Levine
Dale K. Galipo
Attorneys for Plaintiffs

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[PROPOSED] ORDER

Having reviewed the foregoing stipulation, and good cause appearing, the Court hereby amends its prior scheduling orders to reflect the below revised dates:

1. FRCP Rule 35 Physical Examination of Plaintiff Katherine Robles: October 24, 2024
2. FRCP Rule 35 Mental Examination of Plaintiff Katherine Robles: October 25, 2024
3. Deadline for FRCP Rule 35 Examiners to disclose their FRCP Rule 26 and Rule 35 Reports:
November 14, 2024
4. Deadline for Expert Disclosures (other than set forth above): December 16, 2024
5. Supplemental/Rebuttal Expert Disclosures: January 15, 2025
6. Expert Discovery deadline: March 14, 2025
7. All dispositive motions must be filed by: May 16, 2025

IT IS SO ORDERED.

Date:

JUDGE KIMBERLY J. MUELLER

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